

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DANA GROTTANO, N.D., A.R. and D.M.,)
individually and on behalf of all others similarly)
situated,)
Plaintiffs,)
v.) 15 Civ. 9242 (RMB)(KNF)
THE CITY OF NEW YORK; THE CITY OF NEW)
YORK DEPARTMENT OF CORRECTION)
COMMISSIONER JOSEPH PONTE; CORRECTION)
OFFICER YOLANDA CAPERS; CAPTAIN ERICA)
MAYWEATHER; CORRECTION OFFICER)
THOMASENA GRAHAM; and JOHN AND JANE)
DOE CORRECTION OFFICERS 1-25,)
Defendants.

**NOTICE OF UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND CERTIFICATION
OF SETTLEMENT CLASS**

For the reasons set forth in the memorandum of law in support of Plaintiffs' motion for preliminary approval of this class action settlement; the supporting exhibits thereto; the memorandum of law in support of Plaintiffs' motion for final approval of this class action settlement; the August 13, 2021, Declaration of Bruce E. Menken; the August 12, 2021, Declaration of Melissa Baldwin; and the exhibits thereto, Plaintiffs respectfully request that the Court enter the Proposed Order and Final Judgment Granting Final Approval of Class Settlement; retain jurisdiction of this action in order to enter such further orders as may be necessary or appropriate in administering and implementing the terms and provisions of the original settlement agreement, ECF No. 251-3, and the modifications thereto, ECF No. 322-2; and grant any other relief that the Court deems just and proper.

Dated: August 13, 2021

Respectfully submitted,

/s/ Raymond Audain

Raymond Audain
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
40 Rector Street 5th Fl.
New York, NY 10006
(212) 965-7715

Bruce E. Menken
Scott Simpson
MENKEN SIMPSON & ROZGER LLP
80 Pine Street, 33rd Floor
New York, NY 10005
(212) 509-8088

Oren Giskan
GISKAN SOLOTAROFF & ANDERSON LLP
90 Broad Street, 2d Floor
New York, NY 10004
(212) 847-8315

Counsel for Plaintiffs